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5	Facsimile: (415) 875-6700	
6	Attorneys for Defendant International Business Machines Corporation	
7		
8	UNITED STATES DISTRICT COURT	
9	EASTERN DISTRICT OF CALIFORNIA	
10	SACRAMENTO DIVISION	
11		
12	PAUL ORTEGA,	) Case No. CIV S-04-1912 LKK GGH
13	Plaintiff,	) STIPULATION AND ORDER ) DISMISSING ENTIRE ACTION WITH ) PREJUDICE
14	V.	
15	INTERNATIONAL BUSINESS MACHINES CORPORATION, a New York corporation;	) )
16	DOES 1-50,	) )
17	Defendant.	) )
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	STIPULATION AND [PROPOSED] ORDER DISMISSING ENTIRE ACTION WI' Case No. CIV-S-04-1912 LKK GGH	TH PREJUDICE

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1	Pursuant to Federal Rule of Civil Procedure 41(a)(1) and in accordance with the terms of	
2	a confidential settlement agreement between the parties, plaintiff Paul Ortega and defendant	
3	International Business Machines Corporation hereby stipulate to the dismissal with prejudice of	
4	the entire action and each and every claim therein. Each party further agrees that he or it shall	
5	bear his or its own attorneys' fees and costs.	
6	Dated: April, 2005 LAW OFFICES OF JEFFERY L. ARAN	
7		
8	By /signature on original	
9	Jeffery L. Aran Attorneys for Plaintiff	
10	Paul Ortega	
11		
12	Dated: April, 2005 QUINN EMANUEL URQUHART OLIVER &	
13	HEDGES, LLP	
14		
15	By /signature on original Scott G. Lawson	
16	Attorneys for Defendants International Business Machines Corporation	
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## Case 2:04-cv-01912-LKK-GGH Document 20 Filed 05/10/05 Page 3 of 3 Pursuant to the foregoing stipulation of all parties, IT IS HEREBY ORDERED that the entire action and each and every claim therein, is DISMISSED with prejudice. Each party shall bear his or its own attorneys' fees and costs. Dated: May 9, 2005 /s/Lawrence K. Karlton Lawrence K. Karlton United States District Judge